

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KYLER H., a minor, and)	
LOJWANNA M., Individually and as guardian)	Case No. 08 C 1125
and next friend of KYLER H.,)	
Plaintiffs,)	
)	
v.)	
)	Judge St. Eve
)	
BOARD OF EDUCATION OF THE CITY OF)	
CHICAGO, DISTRICT 299)	Magistrate Judge Mason
Defendants.)	

OFFER OF JUDGMENT

Defendant Board of Education ("Board"), by its attorneys, pursuant to Rule 68 of the Federal Rules of Civil Procedure, hereby makes an offer of judgment to plaintiff, Kyler H., a minor, and Lojwanna M., mother and next friend and Individually, as follows:

1. Defendant Board hereby offers to allow judgment to be taken against it in favor of plaintiff, Kyler H., a minor, and Lojwanna M., mother and next friend, in the total amount of THIRTY SEVEN THOUSAND DOLLARS (\$37,000.00). This amount reflects the Board's total liability, and is inclusive of all attorneys' fees, litigation expenses and costs now accrued in this current complaint as well as for the due process request described in this current complaint.

2. This offer of judgment is inclusive of all claims Plaintiffs Kyler H., a minor, and Lojwanna M., mother and next friend, have or may have against Defendant

Board and any other former or current employees or agents of the Board of Education, arising from the incident or injuries alleged in plaintiffs' complaint.

3. Pursuant to Fed. R. Civ. P. 68, an offer not accepted within ten (10) days after service of the offer shall be deemed withdrawn and evidence thereof is not admissible, except in a proceeding to determine costs.

Dated this 6th day of March, 2008.

Respectfully submitted,

Patrick J. Rocks
General Counsel

By: s/James J. Seaberry
James J. Seaberry
Attorney for Defendant Board
Assistant General Counsel
Board of Education of the
City of Chicago-Law Department
125 South Clark Street, Suite 700
Chicago, Illinois 60603
(773) 553-1700